

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**DEFENDANT JARRETT'S MOTION FOR DOWNWARD DEPARTURE**

Defendant, Theodore Jarrett (“Jarrett”), moves the Court to depart downward from the final advisory sentencing guideline range as determined by the Court to a sentencing offense level that permits the Court to impose a sentence of one (1) day incarceration followed by three years of supervised release with special conditions requiring twelve (12) months of home detention with electronic monitoring and one thousand (1,000) hours of community service.

The defendant advances the following grounds in support of departure either alone or in the aggregate:

1. The Loss Overstates Seriousness of the Offense
2. Extraordinary Family Responsibilities
3. Vulnerability to Abuse in Prison
4. Substantial Assistance

As support for the reasons, the Court is referred to the Memorandum of Law.

Respectfully Submitted,

THEODORE JARRETT  
By his Attorneys,

/s/ Maria R. Durant

---

Maria R. Durant (BBO No. 558906)  
William H. Kettlewell (BBO No. 270320)  
Dwyer & Collora, LLP  
600 Atlantic Ave.  
Boston, MA 02210-2211  
(617) 371-1000

**CERTIFICATE OF SERVICE**

I, Maria R. Durant hereby certify that a true and correct copy of this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on this 2<sup>nd</sup> day of October, 2006.

/s/ Maria R. Durant

---

Maria R. Durant